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Attorneys for Defendant
AT&T UMBRELLA BENEFIT PLAN NO. 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

FREDERICK HEGARTY,

Plaintiff,

vs.

AT&T UMBRELLA BENEFIT PLAN NO. 1,

Defendants.

Case No. C14-01976 EMC

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE THE LAST
DAY TO FILE A MOTION FOR
ATTORNEY'S FEES AND CASE
MANAGEMENT STATEMENT**

Complaint Filed: April 29, 2014

Plaintiff Frederick Hegarty ("Plaintiff") and Defendant AT&T Umbrella Benefit Plan No. 1 (the "Defendant") (collectively referred to as the "Parties") through their respective counsel hereby stipulate as follows:

WHEREAS, on June 11, 2015, the Court issued an order denying Defendant's motion for summary judgment and granting Plaintiff's motion for summary judgment (the "Order") and awarded Plaintiff reasonable attorney's fees [Dkt No. 46];

1 WHEREAS, the Court instructed the Parties to meet counsel over the amount of
2 attorney's fees and that if no agreement is reached, Plaintiff shall file a motion for attorney's fees
3 by July 2, 2015;

4 WHEREAS, the Court scheduled a further Case Management Conference for August 27,
5 2015 [Dkt No. 47]; and

6 WHEREAS, the Parties are continuing to meet and confer over the amount of attorney's
7 fees and require additional time to complete said meet and confer;

8 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties through
9 their respective attorneys of record that the last day to file a motion for attorney's fees be July 31,
10 2015, and the Case Management Conference be continued to September 24, 2015, at 10:30 a.m.

11 Respectfully submitted,

12 Dated: June 24, 2015

LAW OFFICES OF P. RANDALL NOAH

13
14 /s/ P. Randall Noah
15 P. RANDALL NOAH
16 Attorneys for Plaintiff
FREDERICK HEGARTY

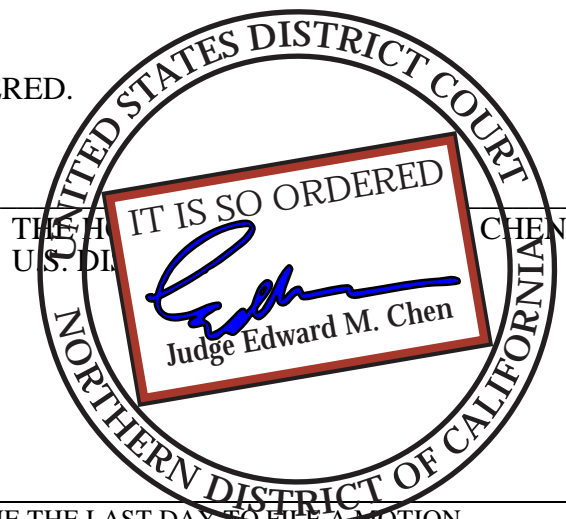
17 Dated: June 24, 2015

LAFAYETTE & KUMAGAI LLP

18
19 /s/ Susan T. Kumagai
20 SUSAN T. KUMAGAI
21 Attorneys for Defendant
22 AT&T UMBRELLA BENEFIT PLAN NO. 1

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: June 26, 2015



SIGNATURE ATTESTATION

I hereby attest that I have obtained the concurrence of P. Randall Noah, counsel for Plaintiff, for the filing of this stipulation.

/s/ Susan T. Kumagai
SUSAN T. KUMAGAI

CERTIFICATE OF SERVICE

I certify that a copy of this document was served electronically on June 24, 2015, on counsel of record in compliance with Federal Rule 5 and Local Rule 5.6, by use of the Court's ECF system.

/s/ Susan T. Kumagai
SUSAN T. KUMAGAI